

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SONYA LARSON,

Plaintiff

v.

C. A. No.: 1:19-CV-10203-IT

DAWN DORLAND PERRY,
COHEN BUSINESS LAW GROUP, PC and
JEFFREY A. COHEN, ESQUIRE,

Defendants.

**DEFENDANTS' STATEMENT PURSUANT TO LOCAL RULE 16.1 AND
FED. R. CIV. P. 26(f)**

Pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 16.1, counsel for Defendants have conferred and now submit the following Joint Statement in anticipation of the scheduling conference set for June 18, 2019 at 11:00 a.m. Defendants' counsel attempted to confer with Plaintiff's counsel, but were unable to obtain input from same.

I. Agenda of Matters to Be Discussed at Scheduling Conference

- a. Proposed Pretrial Schedule (See Exhibit A)
 - i. Initial Disclosures
 - ii. Discovery Plan
 - iii. Motion Schedule, Anticipated Motions
 - iv. Pretrial Conference
- b. Set Hearing Schedule for Motions to Dismiss
- c. Settlement Proposal/Mediation/Alternative Dispute Resolution
- d. Trial by Magistrate Judge

e. Any other matter listed in Fed. R. Civ. P. 16(c)

II. Proposed Pretrial Schedule

Defendants' proposed scheduling order is attached hereto as Exhibit A.

III. Settlement Proposal

Defendants have not received a written settlement proposal from Plaintiff.

IV. Reassignment to a Magistrate Judge

Defendants do not object to referral to a Magistrate Judge for discovery matters, but the parties do not consent to a trial by Magistrate Judge.

V. Local Rule 16.1(d)(3) Certifications

Pursuant to Local Rule 16.1(d)(3), certifications from the parties' respective counsel and authorized representatives will be filed by each party.

VI. Discovery of Electronically Stored Information ("ESI")

Defendants agree that document production, including the production of ESI, is governed by applicable provisions of Fed. R. Civ. P. 34.

DAWN DORLAND PERRY,

By her attorneys,

/s/ Suzanne Elovecky

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CERTIFICATE OF SERVICE

I, Suzanne Elovecky, hereby certify that on June 18, 2019 the foregoing document was served electronically on all counsel of record via the Court's ECF filing system.

/s/ Suzanne Elovecky
Suzanne Elovecky